

1 PITE DUNCAN, LLP
2 EDDIE R. JIMENEZ (NV Bar #10376)
3 JACQUE A. GRUBER (NV Bar #11385)
4 ACE VAN PATTEN (NV BAR #11731)
5 4375 Jutland Drive, Suite 200
6 P.O. Box 17933
7 San Diego, CA 92177-0933
8 Telephone: (858) 750-7600
9 Facsimile: (619) 590-1385
10 E-mail: ecfnvb@piteduncan.com

11 ABRAMS & TANKO, LLP
12 MICHELLE L. ABRAMS (NV Bar #005565)
13 3085 S. Jones Blvd., Suite C
14 Las Vegas, NV 89146

15 Attorneys for Secured Creditor EMC MORTGAGE CORPORATION

16 UNITED STATES BANKRUPTCY COURT
17 DISTRICT OF NEVADA

18 In re

19 JULIAN BETTENCOURT AND MARIA N
20 BETTENCOURT,

21 Debtor(s).

Bankruptcy Case No. BK-S-09-26769-lbr

Chapter 11

EMC MORTGAGE CORPORATION'S
REQUEST FOR SPECIAL NOTICE AND
SERVICE OF PAPERS AND
RESERVATION OF RIGHTS

22 TO: UNITED STATES BANKRUPTCY JUDGE, THE DEBTORS, AND ALL
23 INTERESTED PARTIES

24 PLEASE TAKE NOTICE that the firm of PITE DUNCAN, LLP, attorneys for EMC
25 Mortgage Corporation, hereby requests special notice of all events relevant to the above-referenced
26 bankruptcy and copies of all pleadings or documents filed in relation to the above-referenced
27 bankruptcy, including all pleadings or notices under Federal Rules of Bankruptcy Procedure, Rule
28 2002, the commencement of any adversary proceedings, the filing of any requests for hearing,
objections, and/or notices of motion, or any other auxiliary filings, as well as notice of all matters
which must be noticed to creditors, creditors committees and parties-in-interest and other notices as
required by the United States Bankruptcy Code and Rules and/or Local Rules of the above-
referenced bankruptcy court.

PITE DUNCAN, LLP, requests that for all notice purposes and for inclusion in the Master Mailing List in this case, the following address be used:

ACE VAN PATTEN, ESQ.
PITE DUNCAN, LLP
4375 Jutland Drive, Suite 200
P.O. Box 17933
San Diego, CA 92177-0933

Neither this Request for Special Notice nor any subsequent appearance, pleading, claim, proof of claim, documents, suit, motion nor any other writing or conduct, shall constitute a waiver of the within party's:

a. Right to have any and all final orders in any and all non-core matters entered only after de novo review by a United States District Court Judge;

c. Right to receive service pursuant to Fed. R. Civ. P. 4 made applicable to the instant proceeding by Fed. R. Bankr. P. 7004;

d. Right to trial by jury in any proceeding as to any and all matters so triable herein, whether or not the same be designated legal or private rights, or in any case, controversy or proceeding related hereto, notwithstanding the designation or not of such matters as "core proceedings" pursuant to 28 U.S.C. § 157(b)(2)(H), and whether such jury trial right is pursuant to statute or the United States Constitution;

e. Right to have the reference of this matter withdrawn by the United States District Court in any matter or proceeding subject to mandatory or discretionary withdrawal; and

f. Other rights, claims, actions, defenses, setoffs, recoupments or other matters to which this party is entitled under any agreements at law or in equity or under the United States Constitution.

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1 All of the above rights are expressly reserved and preserved by this party without exception
2 and with no purpose of confessing or conceding jurisdiction in any way by this filing or by any other
3 participation in these matters.

4 Dated: March 12, 2010

/s/ Ace Van Patten

4375 Jutland Drive, Suite 200

P.O. Box 17933

San Diego, CA 92177-0933

(858) 750-7600

NV Bar #11731

Attorney for EMC MORTGAGE CORPORATION